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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SANDRA K. KRAUSE,)	Case No.: 2:12-cv-00342-JCM-CWH
)	
Plaintiff,)	STIPULATION FOR EXTENSION FOR
)	PLAINTIFF TO FILE HER OPPOSITON
vs.)	TO DEFENDANTS' RULE 37(b)
)	MOTION FOR SANCTIONS AND
NEVADA MUTUAL INSURANCE)	CONTEMPT [Dkt. 80]
COMPANY and TREA CORPORATION,)	
)	
Defendants.)	(First Request)

Defendants filed their Rule 37(b) Motion for Sanctions and Contempt [Dkt. 80] on the Friday before Memorial Day weekend, May 24, 2013, and it was filed under seal. As a result of the filing under seal, counsel for Defendants mailed the Motion to counsel and it wasn't received by the undersigned until the following Wednesday, May 29, five days after it was filed due to the holiday weekend.

The justification for said extension is that Plaintiffs lead counsel who is handling this matter along with co-counsel will be unable to complete Plaintiff's opposition to Defendants Motion for

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1 Sanctions and Contempt because Ms. England has been out of state on State Bar of Nevada
2 business since Thursday, June 6, and she did not return until Sunday, June 9, 2013. Upon her
3 return, and in addition to this opposition and other oppositions and a reply plaintiff's counsel are
4 preparing in this case, counsel are preparing for two separate depositions in another case.

5
6 Like Ms. England, Ms. Hill is a sole practitioner and had to attend to other pressing case
7 commitments in a few of her federal criminal cases over the last week and a half and she has been
8 unable to complete the opposition. Additionally, due to the nature of the motion, additional time
9 is necessary to properly and completely oppose the Motion for Sanctions and Contempt and a
10 modest ten day extension of the deadline is warranted.

11
12 At the request of Plaintiff's counsel, and as a professional courtesy among counsel, the
13 parties agree to allow the Plaintiff a ten (10) day extension of time to file her opposition to
14 Defendants Motion for Sanctions and Contempt. Plaintiff respectfully requests that the Court
15 grant this stipulation allowing the Plaintiff an additional ten days (10) from Monday, June 10,
16 2013 to and including Thursday, June 20, 2013. This modest extension would not unduly delay
17 or prejudice anyone in this matter and is warranted under the circumstances and based on the
18 current procedural posture of this case.

19
20 THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE that the time for
21 Plaintiff to file her opposition to Defendants Motion for Sanctions and Contempt be extended for
22 ten days from Monday, June 10, 2013 to and including **Thursday, June 20, 2013.**

23 Respectfully submitted: June 10, 2013.

24 By: /s/ Melanie A. Hill
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ORDER

Based on the foregoing Stipulation of the parties and good cause appearing,

IT IS HEREBY ORDERED that the time for Plaintiff to file her opposition to Defendants Motion for Sanctions and Contempt be extended for ten days from Monday, June 10, 2013 to and including **Thursday, June 20, 2013**.

DATED this 11th day of June, 2013.



U.S. Magistrate Judge Carl W. Hoffman